IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

JENNIFER PIGGOTT and SLADE PIGGOTT,)
Plaintiffs,)
v.) CASE NO. 2:06-CV-1158-MEF
GRAY CONSTRUCTION, INC., et al.,)
Defendants.)

MOTION TO EXTEND SCHEDULING ORDER

COMES NOW Intervenor Plaintiff Hwashin America Corporation, by and through its worker's compensation carrier, the Alabama Self-Insured Worker's Compensation Fund (hereinafter "Hwashin"), by and through the undersigned counsel of record, and hereby moves this Honorable Court to extend the deadline for filing motions to amend pleadings and adding parties pursuant to this Court's <u>Uniform Scheduling Order</u>, Section 4, entered on March 20, 2007, on the following grounds:

- 1. This Honorable Court entered a Uniform Scheduling Order (Doc. #7) on March 20, 2007, setting forth various discovery, pretrial, and trial deadlines, including a deadline to amend pleadings and add additional parties on or before May 30, 2007.
- 2. On May 16, 2007, this Honorable Court granted Hwashin's Motion to Intervene adding it as a party in the litigation. (Doc. #17).
- 3. Pursuant to the Court's Order permitting Hwashin to intervene, the Court ordered that Hwashin file its original Complaint on Intervention "no later than May 31, 2007," one day later

than the deadline to add additional parties pursuant to the Court's Uniform Scheduling Order. (Doc. #17).

4. As trial in this matter is set for March 3, 2008, it is believed no party will be prejudiced by extending the deadline for all parties to amend the pleadings and add additional parties to September 1, 2007, or at a minimum July 17, 2007, pursuant to the suggested time in the Report of Parties Planning Meeting.

WHEREFORE, Intervenor Plaintiff Hwashin respectfully requests this Honorable Court extend the deadline for amending pleadings and adding new parties until September 1, 2007, or at a minimum, at least July 17, 2007.

s/ W. Christopher Waller, Jr.

W. Christopher Waller, Jr. (WAL187) James A. Rives (RIV005) Attorneys for Hwashin America Corporation, by and through the Alabama Self-Insured Worker's Compensation Fund

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that on May 25, 2007, I electronically filed the foregoing with the Clerk of the Court, using the CM/ECF system which will send notification of such filing to the following registered persons and that those persons not registered with the CM/ECF system were served by U.S. mail:

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s/ W. Christopher Waller, Jr.
OF COUNSEL